



AIR TRANSPORT ASSOCIATION

October 18, 2004

Docket Management Facility,
U.S. Department of Transportation,
Attention: Docket No. FAA-2004-18997, Directorate Identifier 2004-NM-19-AD
400 Seventh Street SW.,
Nassif Building, Room PL-401,
Washington, DC 20590.

Subject: A300B737 Body Station 291.5 Doorstop Intercostal Strap – Proposed Rule

Ladies/Gentlemen:

FAA proposes to adopt a new airworthiness directive (AD) for certain Boeing 737-100, -200, -200C, -300, -400, and -500 series airplanes. This proposed AD would require repetitive detailed and eddy current inspections to detect cracking of the frame web around the cutout for the doorstop intercostals strap at the aft side of the Body station 291.5 frame at stringer 16R, and corrective actions if necessary. ATA appreciates the opportunity to comment on this proposed rule.

Our members generally support the intent of the rulemaking; however, additional review and clarification would be desirable on the attached comments. Specifically:

- Cost and Compliance Estimates – No account is given for gaining access and closing. The inspections in most cases will not be accomplished at a heavy check. Therefore additional man hours need to be considered outside normal maintenance operations.

Your serious consideration of these observations and comments would be greatly appreciated.

Sincerely,

Robert Peel
Director of Quality
Air Transport Association

Attachments (2)

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AIR TRANSPORT ASSOCIATION OF AMERICA, INC.

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U·S AIRWAYS

Mark R. Rudo
Managing Director – Technical Services

417-EMA-04-03
Sent Via Email

October 11, 2004

Mr. Robert Peel
Director of Quality
Air Transport Association
1301 Pennsylvania Avenue, NW
Suite 1100
Washington, DC 20004-1707

Subject: B737 Station 291.5 Frame Inspection at Forward Galley Door Opening - Proposed Rule

References: /A/ ATA Memorandum No. 04-AD-348
/B/ Boeing Service Bulletin 737-53A1241, dated June 3, 2002

Dear Mr. Peel:

The reference /A/ memorandum advises that the FAA proposes to adopt a new airworthiness directive (AD) for certain 737 classic aircraft and invites comments. The proposed AD would require repetitive inspections of the station 291.5 frame, adjacent to the forward entry door opening. The initial inspections would be required prior to 40,000 total aircraft flight cycles, or within 2,250 flight cycles, whichever occurs later. Repetitive inspections at 4,500 cycle intervals would be required. The inspections are the subject of the reference /B/ service bulletin.

US Airways operates a fleet of 114 737-300/400 passenger aircraft, which would be affected by the proposed AD. US Airways' aircraft have accumulated between approximately 25,000 and 40,000 cycles.

US Airways generally agrees with the intent of the proposed AD. However, we note that the FAA's man-hour estimate to accomplish the inspections is misleading. The proposed AD estimates that the inspection would take two man-hours, which does not include any time for gaining access and closing. The stated initial and repetitive inspection thresholds will require that approximately half of the inspections be accomplished outside of heavy maintenance visits (US Airways' Q-Check). It is only at Q-Check that the area is accessible without additional effort. The inspections performed outside of Q-Check will require approximately twenty additional man-hours for access and closing.

Sincerely,

/s/ Mark R. Rudo

Mark R. Rudo
Managing Director - Technical Services

MRR/ema /agb



October 11, 2004

Air Transport Association of America
1301 Pennsylvania Ave., NW, Suite 1100
Washington, D.C. 20004-1707

Attention: Mr. Robert Peel
Director of Quality

Subject: 737 Stringer 16R Body Station 291.5 Frame Web
Docket No. NPRM 2004-NM-19-AD

Reference: ATA Memo 04-AD-348

Dear Mr. Peel,

After reviewing the contents of the subject NPRM, we offer the following comments:

The proposed rule as stated does not address requirements of inspections if a repair exists in the subject area.

The referenced NPRM does not provide a means for terminating the repetitive inspections. Removing the galley every 4,500 cycles for a repetitive inspection will place a significant burden on operators, as this will push galley removal outside of normal maintenance operations.

The cost and compliance section of this NPRM is misleading in that open and close hours are excluded. The initial and repetitive inspections, in most cases, will not be accomplished at a heavy check where a galley is being removed concurrently. Numerous aircraft will require open/close man-hours for this inspection outside of normal maintenance operations, which per SB requires an additional 19.5 man-hours per aircraft.

Thank you in advance for conveying these comments to the FAA. If you have any questions, or if you require additional information regarding our position, please contact Alanna Crafton at (317) 704-6783.

Sincerely,

Jim Miccio
Acting Chief Engineer

San Francisco International Airport, San Francisco, California 94128

cc: R. Bernicchi, United Airlines - INDEG
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